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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

LISA TABAK, DE'JHONTAI  
BANKS, DAVID DANON, BRIANNA  
CASTELLI, MATTHEW WHITE, KELLY  
CAMELO-CENICOLA, NESTOR  
TRUJILLO, and CHRISTINE CLEMENCE,  
on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

APPLE, INC.,

Defendant.

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CASE NO. 4:19-CV-02455-JST

**JOINT CASE MANAGEMENT  
STATEMENT**

Pursuant to Civil Local Rule 16-9, Plaintiffs Lisa Tabak, De’Jhontai Banks, David Danon, Brianna Castelli, Matthew White, Kelly Camelo-Cenicola, Nestor Trujillo, and Christine Clemence, on behalf of themselves and all others similarly situated (“Plaintiffs”), and Defendant Apple Inc. hereby submit the following Joint Case Management Statement for the Case Management Conference scheduled for July 2, 2021, at 1:30 P.M. The parties specifically submit this Statement pursuant to the Court’s Order continuing the previously scheduled case management conference. ECF No. 103; *see also* ECF No. 95, at 2 (setting forth the format for case management statements submitted in this manner).

# **I. RELEVANT HISTORY & STATUS OF DISCOVERY.**

The parties’ last case management conference took place on February 2, 2021. On April 28, 2021, the parties jointly submitted a case management statement. ECF No. 102. Following the filing of that statement, the Court continued the case management conference to July 2, 2021. ECF No. 103.

Plaintiffs propounded written discovery requests on January 25, 2021. On March 10, 2021, Defendant served its responses and objections to Plaintiffs’ discovery requests. Since that time, the parties have exchanged written correspondence and met and conferred via telephone to discuss Plaintiffs’ issues with Defendant’s responses and objections. The parties met and conferred via telephone on June 29, 2021, in a further effort to resolve these outstanding issues. While the parties have not resolved each issue as of the date of this filing, the parties continue to work expeditiously to resolve these issues without the Court’s intervention. Defendant served its first sets of Requests for Production, Interrogatories, and Requests for Inspection on Plaintiffs on June 29, 2021.

The parties have worked cooperatively to develop a Joint Protective Order and ESI Stipulation. The Court entered the parties’ Stipulated Protective Order on May 18, 2021, ECF No.

1 109, and the parties' stipulated ESI Order on June 2, 2021, ECF No. 112. Following this, the parties  
 2 met and conferred via telephone on June 29, 2021, to discuss the selection of search terms and  
 3 custodians relating to Defendant's production of documents in response to Plaintiffs' discovery  
 4 requests. The parties continue to work cooperatively and expeditiously to select search terms and  
 5 custodians so that documents may be produced and discovery may continue.  
 6

7 At this time, there are no additional issues that the parties believe require the Court's  
 8 attention.

9 DATED: June 30, 2021

10 /s/ William A. Ladnier

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**ATTESTATION**

I, William A. Ladnier, am the ECF User whose ID and password are being used to file the foregoing document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that counsel has concurred in this filing.

/s/ William A. Ladnier  
William A. Ladnier

*Attorney for Plaintiffs*